

EXHIBIT B

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

MARK SNOOKAL, an individual,)
)
Plaintiff,)
)
v.) NO. 2:23-cv-6302-
) HDV-AJR
CHEVRON USA, INC., a California)
Corporation, and DOES 1 through)
10, inclusive,)
)
Defendants.)
_____)

Videotaped deposition of ALEXANDER
R. MARMUREANU, M.D., Witness, taken remotely
on behalf of Defendants commencing at 2:04
p.m. on Wednesday, January 29, 2025, before John
M. Taxter, Certified Shorthand Reporter No. 3579
in and for the State of California, a Registered
Professional Reporter.

1	A	That's correct.	14:08:35
2	Q	And do you understand you've been	14:08:36
3		retained as an expert to provide testimony on	14:08:37
4		behalf of Plaintiff Mark Snookal?	14:08:40
5	A	Well, I mean, that's a very lawyer way	14:08:46
6		of talking. My understanding, I'm -- I'm not an	14:08:49
7		advocate. I'm an expert. I'm being asked to	14:08:52
8		provide -- to review records and provide an	14:08:54
9		opinion. Now, if you call it I'm being asked to	14:08:58
10		provide testimony on behalf of the plaintiff,	14:09:00
11		maybe, but that's not what was told to me.	14:09:02
12	Q	Okay. Well, let me ask you this: What	14:09:04
13		were you told?	14:09:07
14	A	To review the records and formulate an	14:09:08
15		opinion.	14:09:10
16	Q	And what records were you asked to	14:09:10
17		review?	14:09:12
18	A	I do believe you -- you should have	14:09:14
19		those. If not, I have a folder here open in front	14:09:16
20		of me. Medical records, radiologic studies. I	14:09:18
21		think there were some court documents. I -- I can	14:09:25
22		open them. They're all here.	14:09:27
23	Q	Sure. Can you let me know what	14:09:29
24		documents you were asked to review.	14:09:30
25	A	There is a complaint; Case	14:09:32

1	No. 2:23-cv-6302, complaint for damages. There	14:09:39
2	was -- there is an assignment offer for the	14:09:48
3	location Escravos in Nigeria; medical suitability	14:09:54
4	for expatriate assignment history and physical	14:10:03
5	examination; a letter from Kaiser Permanente dated	14:10:07
6	7/29/2019 from Dr. Khan, K-h-a-n; some e-mail from	14:10:18
7	Levy, Scott, to Dr. Khan; another expatriate exam	14:10:31
8	recommendation, GO-1769. Another letter seems to	14:10:48
9	be from Kaiser Permanente signed by Dr. Khan;	14:10:54
10	mental health questionnaire for employee, GO-1750;	14:11:01
11	request for medical service, GO-147-1, Chevron;	14:11:10
12	primary care physician Dr. Fleischman, member name	14:11:21
13	Mark Snookal, four pages dated 7/18/2019; Quest	14:11:26
14	Diagnostics report status on Mark Snookal, labs;	14:11:40
15	medical suitability for expatriate assignment	14:11:48
16	history and physical exam. I'm not sure it's the	14:11:51
17	same. It's GO-146-MSEA. It looks different.	14:11:54
18	Chevron brief note, encounter info subjective, two	14:12:07
19	pages; physical requirements and working	14:12:14
20	condition, GO-308, Chevron, four pages; current	14:12:20
21	assignment information, 0065 Chevron Products	14:12:30
22	Company, and they have some Kaiser Permanente	14:12:37
23	records in them. Basically, it's the CAT scan.	14:12:40
24	Another record from Kaiser Permanente, Mark	14:12:47
25	Snookal, dated 4/16/2019, 2:00 p.m. interface. It	14:12:51

1 seems to be an ECHO result; another expatriate 14:12:59
2 exam recommendation, GO-1769; an article from 14:13:07
3 Circulation, "Risk of Rupture or Dissection in the 14:13:15
4 Descending Thoracic Aortic Aneurysm." 14:13:22
5 "Descending," it says, not "ascending"; three 14:13:23
6 pages seems to be communication e-mail from Mark 14:13:27
7 Snookal to Scott Levy; EMR report; Kaiser 14:13:35
8 Permanente disclosure of patient medical 14:13:41
9 information; job title, NMA EGTL reliability 14:13:45
10 engineering manager, two pages; 14:13:56
11 "neuroradiology" -- neuroradiologic studies; and 14:13:58
12 a depo, Dr. Ujomoti Akintunde, 104 pages, Snookal 14:14:12
13 v. Chevron USA with exhibits. Would you like me 14:14:24
14 to go through the exhibits or -- 14:14:29
15 Q No. No. That's fine. Just -- you have 14:14:31
16 the deposition transcript with the exhibits? 14:14:32
17 A I do. 14:14:35
18 Q Okay. 14:14:35
19 A Several exhibits, by the way. One, two, 14:14:36
20 three, four, five, six, seven, eight -- 11 14:14:39
21 exhibits plus his depo, mainly articles. I see a 14:14:43
22 lot of articles here and a medical incident, 14:14:47
23 Escravos fatalities, 2017-2022 -- it looks like a 14:14:55
24 lot of sick people there -- and a medical summary, 14:15:00
25 one page, Mark Snookal. I think that's all. 14:15:03

1 Q Okay. Doctor, did you review 14:15:07
2 Dr. Akintunde's deposition after you prepared your 14:15:11
3 report? 14:15:18
4 A I don't remember. I would have to 14:15:18
5 check. I don't know. 14:15:22
6 Q Okay. We'll come back to that. As to 14:15:28
7 the articles, what articles other than the article 14:15:29
8 from Joon, J-o-o-n; Bum, B-u-m; last name, Kim -- 14:15:33
9 and it looks like the -- the magazine or 14:15:39
10 periodical is called "Circulation." 14:15:43
11 My question is other than that article, 14:15:46
12 what other articles did you review as part of your 14:15:47
13 document review? 14:15:53
14 A Well, first of all, I reviewed the 14:15:56
15 articles provided, and I would assume they were 14:16:00
16 provided by you and your experts; those articles. 14:16:02
17 Now, that's what I do for a living. I'm a 14:16:06
18 cardiothoracic surgeon. I follow aneurysms. I 14:16:09
19 repair them. I do surgery for dissection. So I'm 14:16:14
20 very familiar with the current literature. 14:16:17
21 Actually, I give a lot of talks. I teach 14:16:18
22 residents, students, fellows, and I train surgeons 14:16:21
23 all over the world for those procedures. 14:16:24
24 However, in anticipation for this depo 14:16:27
25 and for the case I did review a few articles, and, 14:16:31

1 honestly, I think I -- I will have to apologize 14:16:36
2 because I believe you received those maybe late. 14:16:40
3 It's totally my fault -- it's not the attorneys -- 14:16:44
4 because I had a phone conversation with them 14:16:47
5 earlier today, and I said, "Well, look, I put this 14:16:49
6 document together," because I looked at the depo 14:16:51
7 when I re-reviewed the depo last night. 14:16:54
8 Obviously, you guys got into the literature there, 14:16:57
9 so I thought that it would be good for the purpose 14:17:00
10 of discussion to bring some literature. 14:17:01
11 Now, all those things being said, my 14:17:03
12 opinions are based on my training, education, 14:17:05
13 practice, and experience as well as the literature 14:17:08
14 reviewed. And, again, I apologize for providing 14:17:10
15 it so late, but you had nine articles that were 14:17:13
16 sent to you hopefully today, and those are the 14:17:16
17 one, but -- again, they were sent late, but if you 14:17:19
18 feel they were too late, I don't need to base my 14:17:23
19 opinion on those articles. 14:17:26
20 Q My question is a little different. 14:17:27
21 What -- other than what you've 14:17:29
22 already -- what's listed as part of your expert 14:17:30
23 report, did you review any other articles as 14:17:33
24 part -- 14:17:37
25 A Yes. 14:17:37

1 can do one at a time. When you say the articles 14:18:38
2 mentioned in my expert report, which articles are 14:18:42
3 you talking about? 14:18:45

4 Q In your report -- well, I'll tell you 14:18:45
5 what. Let's do it this way. 14:18:47

6 A This was an article provided by your 14:18:48
7 people. 14:18:55

8 Q Doctor, I -- I understand that. I'm 14:18:55
9 just trying to find out what you looked at, so let 14:18:56
10 me just do it this way. 14:19:00

11 A Correct. No. I'm doing my best to 14:19:01
12 answer you. 14:19:03

13 Q Yes. 14:19:04

14 A I looked at whatever is listed. Then I 14:19:04
15 provided another piece of paper; actually, two 14:19:07
16 pages today. Again, what you probably want to 14:19:09
17 hear -- you might not like that -- we'll see. 14:19:13
18 But, you see, I don't have a whole lot of 14:19:16
19 articles. Those are the articles I reviewed 14:19:19
20 because they were provided to me, and I've done -- 14:19:21
21 I reviewed nine other articles to write this 14:19:22
22 synopsis. 14:19:25

23 Now, I've practiced cardiothoracic 14:19:26
24 surgery for the last 35 years. I've reviewed 14:19:29
25 thousands of articles on the subject of aortic 14:19:30

1 aneurysm and dissection. I cannot recall all of 14:19:34
2 them. So if you think that I would be able to 14:19:37
3 tell you which articles I reviewed in the last 14:19:38
4 35 years, the answer is "no." That's the only one 14:19:41
5 I have for you. The articles that you provided, I 14:19:44
6 reviewed them, and, basically, the articles, I 14:19:46
7 provided them. 14:19:52

8 Now, as you can see, in my expert report 14:19:54
9 some of the articles were not listed because they 14:19:57
10 came with the depo of Dr. -- let me say it 14:20:01
11 again -- Ujomoti which means that most likely than 14:20:08
12 not I reviewed his depo after I provided the 14:20:13
13 report because I don't see those articles in the 14:20:16
14 report. 14:20:18

15 Make sense to you? 14:20:19

16 Q Doctor, let me -- let me ask you another 14:20:19
17 question. 14:20:21

18 Other than Dr. Levy and Dr. Akintunde, 14:20:21
19 did you review any other deposition transcripts? 14:20:28

20 A No. 14:20:28

21 Q All right. I'm going to mark as 14:20:42
22 Exhibit 1 -- let me -- I'm sorry. One second. 14:20:48

23 A No problem at all. 14:21:26

24 Q Okay. I'm sorry. A little -- a little 14:21:45
25 problem here. Hold on one second. 14:21:47

1	THE WITNESS: I find here assignment	14:31:19
2	offer, and it's document CUSA 000020-CUSA	14:31:21
3	000023.pdf, assignment offer.	14:31:29
4	BY MS. KENNEDY:	14:31:29
5	Q Okay. That's fine, Doctor. Again, I	14:31:35
6	don't want to waste time.	14:31:37
7	A There are four pages, and I think that's	14:31:38
8	what I meant. To the best of my recollection,	14:31:40
9	that's the job offer, assignment offer. Correct.	14:31:45
10	MS. KENNEDY: Good. Thank you. Yeah.	14:31:51
11	Olivia, if you can, send those to me.	14:31:52
12	You can do it this afternoon, or tomorrow is fine.	14:31:54
13	That's no worries.	14:31:57
14	BY MS. KENNEDY:	14:31:57
15	Q So, Doctor, let me ask you the question	14:31:58
16	now.	14:32:00
17	So what is your opinion in this case	14:32:01
18	with respect to Mr. Snookal?	14:32:06
19	MS. LEAL: Objection. Vague and	14:32:12
20	ambiguous.	14:32:13
21	But go ahead, Doctor.	14:32:13
22	THE WITNESS: Well, I believe you have	14:32:16
23	it, and you sound like a good lawyer. I'm sure	14:32:16
24	you already know my opinion, but let me go through	14:32:21
25	it again.	14:32:21

1 I believe that Mr. Snookal had a 14:32:22
2 4.2-centimeter dilated aortic annulus which is 14:32:26
3 borderline, just millimeters, perhaps one 14:32:32
4 millimeters above normal. He -- technically, he 14:32:36
5 did not have an aortic aneurysm, but even if he 14:32:39
6 did, four centimeters -- his ascending aorta was 14:32:42
7 four centimeters. That's basically normal or just 14:32:47
8 perhaps minimally dilated. 14:32:49
9 None of those findings are clinically 14:32:51
10 significant to warrant exclusion from his 14:32:54
11 assignment in Escravos -- I've got to find the 14:32:56
12 word again -- especially given his well-documented 14:33:04
13 stability in terms of his blood pressure was 14:33:07
14 normal and none of those aortic numbers were 14:33:09
15 growing. Blood pressure control is appropriate, 14:33:13
16 and it is my opinion that he could have safely 14:33:17
17 proceeded to work in that location in Nigeria. 14:33:21
18 And I don't identify any medical or social grounds 14:33:26
19 to consider him unfit for duty or classify his 14:33:30
20 condition a direct threat to him or anyone else. 14:33:34
21 And that's kind of it in a nutshell. 14:33:38
22 BY MS. KENNEDY: 14:33:38
23 Q Okay. Let me ask you this: Did you -- 14:33:42
24 did you review any of the medical studies about 14:33:45
25 health care medical risks working in Escravos, 14:33:50

1 Nigeria? 14:33:53

2 A Well, can you be more -- I -- I reviewed 14:33:56

3 whatever was provided to me. I did not do an 14:34:00

4 independent research for the safety of workers in 14:34:04

5 that location, but I believe he's fit to work in 14:34:08

6 any location anywhere in the world, including that 14:34:12

7 location. So I didn't find it necessary to study 14:34:13

8 the condition in that place. I believe he would 14:34:18

9 be fit to work in Alaska, the base of the 14:34:20

10 Himalaya, in Africa, anywhere else, South America, 14:34:26

11 et cetera. And, by the way, that location clearly 14:34:30

12 had some sick people there because I've seen a lot 14:34:32

13 of fatalities, I think, in five years. So they 14:34:35

14 were going through some -- they had some sick 14:34:44

15 employees. 14:34:45

16 Q I've highlighted the last sentence of 14:34:45

17 the first paragraph of Exhibit 2 which is page 6, 14:34:47

18 and it reads: 14:34:52

19 "Given that his work is 14:34:53

20 desk-based and not physically 14:34:55

21 demanding, there is no evidence to 14:34:56

22 suggest that his condition would 14:34:58

23 affect his job performance or pose 14:35:00

24 an immediate risk." 14:35:02

25 What did you mean by that, Doctor? 14:35:05

1 it's one millimeter on each side. That's not a 14:37:38
2 big deal, but it is a little bit enlarged, I have 14:37:41
3 to admit. 14:37:44

4 However, the ascending aorta, as we look 14:37:44
5 on this heart, this is basically the area that 14:37:47
6 tears. This is the aneurysm we're talking, not 14:37:50
7 the annulus. The annulus is a strong structure 14:37:53
8 where I actually saw the valve. This part is 14:37:57
9 whatever tears, dissects, and ruptures. So this 14:38:01
10 part is pretty much normal. It's four centimeters 14:38:03
11 on him. 14:38:07

12 So, to summarize, I don't believe that 14:38:07
13 his numbers, the aortic numbers, size, dimensions 14:38:09
14 will pose any risk to anyone, including himself or 14:38:12
15 anyone else around him. 14:38:16

16 Q Doctor, do you know what the reliability 14:38:21
17 engineering manager does in Escravos? 14:38:23

18 A I don't remember. I read the assignment 14:38:28
19 job at that time when I wrote the report. 14:38:30

20 Q Do you have any information from any 14:38:35
21 source -- from the lawyers, from any documents -- 14:38:36
22 about what the working conditions would be for 14:38:39
23 Mr. Snookal in Escravos? 14:38:41

24 A I don't remember if I have, but let me 14:38:46
25 do my best to answer this. I don't believe that 14:38:49

1 any work condition, good or bad, him being in -- 14:38:52
2 can you pronounce that location again for me. 14:38:56
3 Q Sure. Escravos. 14:38:59
4 A Escravos. I do not believe that he 14:39:01
5 being in Escravos or not had anything to do with 14:39:05
6 the way this issue will need to be managed moving 14:39:09
7 forward. They do have heart surgery in Nigeria. 14:39:13
8 Actually, I've worked places. I'm fully aware. I 14:39:16
9 have colleagues operating in Nigeria. It seems to 14:39:20
10 be that they have helicopter available just in 14:39:23
11 case there is a problem. But let me say it again 14:39:26
12 that around four centimeters there's absolutely no 14:39:27
13 need for any of those issues. 14:39:30
14 In other words, I have several patients 14:39:34
15 like this that we just send home with no 14:39:36
16 limitation, and we just tell them to follow up 14:39:40
17 once a year with a follow-up CT scan, CT angio. 14:39:43
18 So the factors, work conditions in Escravos have 14:39:48
19 nothing to do with his aortic pathology. 14:39:52
20 Q And do you have any information of what 14:39:53
21 Mr. Snookal's living conditions would have been in 14:39:55
22 Escravos? 14:39:57
23 A I don't remember, as I sit here today. 14:40:00
24 It wouldn't make a difference. He could have a 14:40:02
25 one-bedroom, a studio, three bedroom. He could be 14:40:04

1 minus 20 degrees or plus 90 degrees Fahrenheit. 14:40:08
2 Nothing will change his management. There is 14:40:13
3 no -- no factor that will change what he needs to 14:40:15
4 do based on that aortic pathology. 14:40:19
5 Q Do you have any information from any 14:40:22
6 source -- any documents, any conversations with 14:40:23
7 counsel, anything like that -- about what the 14:40:25
8 health care facilities are in Escravos? 14:40:29
9 A Well, first of all, the health care 14:40:37
10 facilities in Escravos are totally unrelated to my 14:40:40
11 opinion of this case. He doesn't need anything. 14:40:44
12 So it doesn't matter how good or how bad they are. 14:40:46
13 It makes no difference. He doesn't need anything. 14:40:48
14 Q Okay. 14:40:51
15 A Do I know? I know a little bit from the 14:40:51
16 depo that I -- of your cardiology expert. 14:40:53
17 Q And when you say my "cardiology expert," 14:40:57
18 who are you referring to? 14:41:03
19 A Chevron. 14:41:04
20 Q And which one? Which doctor is that 14:41:06
21 you're referring to? 14:41:08
22 A The one -- let me see. Let me pronounce 14:41:09
23 his name on the -- Ujomoti. Hold on a second 14:41:12
24 here. Let me just -- Ujomoti Akintunde apparently 14:41:16
25 is a cardiologist working from Chevron. 14:41:30

1 STATE OF CALIFORNIA)
) SS.
2 COUNTY OF VENTURA)

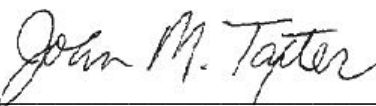
3 I, John M. Taxter, a California Certified
4 Shorthand Reporter, Certificate No. 3579, a
5 Registered Professional Reporter, do hereby
6 certify: That the foregoing proceedings were
7 taken before me at the time and place therein set
8 forth, at which time the deponent was put under
9 oath by me; that the testimony of the deponent and
10 all objections made at the time of the examination
11 were recorded stenographically by me and were
12 thereafter transcribed; and that the foregoing is
13 a true and correct transcript of my shorthand
14 notes so taken.

15 I further certify that I am neither
16 counsel for nor related to any party to said
17 action.

18 The dismantling, unsealing, or unbinding
19 of the original transcript will render the
20 Reporter's Certificate null and void.

21 Pursuant to Federal Rule 30(e),
22 transcript review was requested.

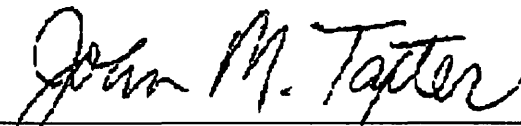
23 Dated February 11, 2025.

24 
25 _____
JOHN M. TAXTER
California Certified Shorthand
Reporter No. 3579, RPR

1
2
3
4 I, John M. Taxter, Certified Shorthand Reporter,
5 CSR No. 3579, hereby certify:

6 The foregoing is a true and correct copy of the
7 original transcript of the proceedings taken by me
8 as thereon stated.
9

10
11
12 Dated: February 13, 2025
13

14
15 
16 _____
17 John Taxter, CSR No. 3579
18
19
20
21
22
23
24
25